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11 *Attorneys for Defendant*
12 *Freeman Expositions, LLC*

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14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 WILLIAM N. COVELL, JR.

17 Plaintiff,

18 vs.

19 FREEMAN EXPOSITIONS, LLC d/b/a
20 FREEMAN, a Foreign Limited Liability
21 Company; TEAMSTERS, CHAUFFEURS,
22 WAREHOUSEMEN AND HELPERS,
23 LOCAL UNION NO. 631; DOES I through X,
24 inclusive; and ROE ENTITIES I through X;
25 inclusive,

26 Defendants.

27 Case No.: 2:20-cv-01058-RFB-NJK

28 **STIPULATION TO EXTEND TIME FOR
DEFENDANT FREEMAN EXPOSITIONS,
LLC TO FILE A RESPONSE TO
PLAINTIFF'S COMPLAINT**

29 IT IS HEREBY STIPULATED by and between Plaintiff WILLIAM N. COVELL, JR.
30 (“Plaintiff”), through his counsel, Vernon L. Bailey, and Defendant, Freeman Expositions, LLC,
31 doing business as Freeman (“Defendant”), by and through its counsel, Jackson Lewis P.C., that
32 Defendant shall have an extension up to and including August 3, 2020, in which to file its
33 response to Plaintiff’s Complaint. This Stipulation is submitted and based upon the following:

34 1. Plaintiff filed his Complaint on June 13, 2020. ECF No. 1. Defendant was served
35 with the Summons and Complaint on June 29, 2020. ECF No. 7.

36 2. Defendant’s response to the Complaint was due on July 20, 2020.

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1 3. Counsel for Defendant was recently retained in this matter. Due to the press of
2 other matters, including adjustments made necessary by the COVID-19 pandemic, and in order to
3 fully respond to the pleading, Defendant requires additional time to respond to the Complaint.
4 Defendant accordingly requests an extension, up to and including August 3, 2020, to file its
5 responsive pleading.

6 4. This is the first request for an extension of time for Defendant to file a response to
7 Plaintiff's Complaint.

8 5. This request is made in good faith and not for the purpose of delay.

9 6. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed
10 as waiving any claim and/or defense held by any party.

11 Dated this 29th day of July, 2020

12 LAW OFFICE OF VERNON L. BAILEY

13 JACKSON LEWIS P.C.

14 _____
15 /s/ Vernon L. Bailey
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32 Attorneys for Defendant

33 **ORDER**

34 For good cause shown, this Stipulation to Extend Time for Defendant Freeman
35 Expositions, LLC to file a response to Plaintiff's Complaint is granted. Defendant shall have on
36 and through August 3, 2020 to file its responsive pleading to the Complaint.

37 IT IS SO ORDERED.

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39 U.S. District/Magistrate Judge

40 Dated: July 30, 2020